

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

No. 4:09-cv-11986-DPW

v.

\$18,380,697.75 Seized from
Bank of America Account Number
898004312605, in the Name of
Rosemont D Corporation
d/b/a Multinvest;

\$995,233.44 Seized From Bank of America
Account Number 898018373449
in the Name of Rosemont R Corporation
d/b/a/ Spectre Capital Inc.; and

\$16,101.72 Seized From Bank of America
Account Number 898018373038
in the Name of Rosemont S Corporation
d/b/a Spencer International Traders

JOINT MOTION FOR FINAL JUDGMENT AND ORDER OF FORFEITURE, and
ORDER RELEASING OTHER PROPERTY

The United States of America, Multinvest Casa de Bolsa,
C.A., Spectre Capital, Inc., and Spencer International Traders
(collectively, the "Parties"), by their undersigned attorneys,
jointly move that this Court endorse the proposed Final Judgment
and Order of Forfeiture and Order Releasing Other Property
submitted herewith, ordering the forfeiture of certain property
to the United States pursuant to Title 18, United States Code,
Sections 981(a)(1)(A) and 984, and releasing certain other
property.

In support of this Motion, the parties state that they have
settled this action, and after due notice, no claims have been

filed other than the claims filed by Multinvest Casa de Bolsa,
C.A., Spectre Capital, Inc., and Spencer International Traders.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney,
By: /s/Richard L. Hoffman
Neil J. Gallagher, Esq.
Richard L. Hoffman, Esq.
Assistant U.S. Attorneys
John Joseph Moakley Courthouse
Suite 9200
1 Courthouse Way
Boston, MA 02210
(617) 748-3100

MULTINVEST CASA DE BOLSA, C.A.
By its attorneys,
/s/Lee Stapleton
Lee Stapleton, Esq.
Baker & McKenzie LLP
Mellon Financial Center
1111 Brickell Avenue, Suite 1700
Miami, Florida 33131

SPECTRE CAPITAL, INC.,
By its attorneys,
/s/Thomas E. Butler
Thomas E. Butler
Chadbourn & Parke LLP
30 Rockefeller Plaza
New York, NY 10112
(212) 408-5283

SPENCER INTERNATIONAL TRADERS,
By its attorneys,
/s/Thomas E. Butler
Thomas E. Butler
Chadbourn & Parke LLP
30 Rockefeller Plaza
New York, NY 10112
(212) 408-5283

CERTIFICATE OF SERVICE

I hereby certify that today I am filing the foregoing document, and the proposed Final Order of Forfeiture and Order Releasing Other Property, via the ECF system, which will cause a copy to be sent by electronic mail to claimants' counsel of record.

/s/Richard L. Hoffman

Richard L. Hoffman

Dated: March 2, 2011

Assistant U.S. Attorney